

California Regional Water Quality Control Board North Coast Region

Beverly Wasson, Chairperson

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September 19, 2005

Ms. Julie B. Raming Georgia-Pacific Corporation P.O. Box 105605 Atlanta, GA 30348-5605

Dear Ms. Raming:

Subject: Workplan for Additional Site Assessment

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg

Case No. 1NMC462

I am writing in regards to the June 8, 2005 Acton Mickelson Environmental, Inc. (AME) plan *Work Plan for Additional Site Assessment* and the subsequent modifications to that plan. This is not in regards to the proposed foundation removal and interim remedial measures work.

Thank you for the August 18, 2005 submittal from AME, entitled *Response to RWQCB Comments on AME's Work Plan for Additional Site Assessment*. We reviewed that document and I provided comment to you and Mr. Michael Acton of AME in a September 7, 2005 e-mail (enclosed with this letter for reference). We received a response from AME on September 16, 2005, entitled *Response to RWQCB Comments on AME's Work Plan for Additional Site Assessment*. That document has been reviewed. The June 8, 2005 AME plan *Work Plan for Additional Site Assessment* is hereby approved as modified by the August 18, 2005 and September 16, 2005 submittals, with the following additional modification:

• EPA Method 5035 should be used in the collection and preservation of soil samples for VOC and TPH-g analyses.

I discussed the workplan and modifications with Mr. Acton on September 16, 2005. I gave verbal approval for this investigation work to begin in that discussion.

In addition to submitting a hardcopy of a report of this work to this office, a number of electronic submittals of information to the GeoTracker system are required by Title 23, Division 3, Chapter 30 of the California Code of Regulations. Please refer to the "Electronic Submittal of Information" link on the GeoTracker website (http://geotracker.waterboards.ca.gov/) for the full requirements.

The report of the investigation work should be submitted to this office and the electronic submittals made to GeoTracker within three months of the completion of the fieldwork. If you

California Environmental Protection Agency

have any questions or comments, you may contact me at chunt@waterboards.ca.gov or (707) 570-3767.

Sincerely,

/ORIGINAL SIGNED BY/

Craig Hunt

Water Resource Control Engineer

CSH:tab/091905_csh_GP_FB0509InvestigationPlanApproval.doc

Enclosure: Comments on Workplan ____

- cc: Acton Mickelson Environmental, Inc., 5175 Hillsdale Circle, Suite 100, El Dorado Hills, CA 95762
 - Ms. Kay M. Johnson, Tetra Tech, Inc., 3746 Mt. Diablo Boulevard, Suite 300, Lafayette, CA 94549
 - Mr. Doug Heitmeyer, Georgia-Pacific Corporation, 90 West Redwood Avenue, Fort Bragg, CA 95437
 - Ms. Linda Ruffing, Community Development Department, City of Fort Bragg, 416 N. Franklin Street, Fort Bragg, CA 95437
 - Mendocino County Environmental Health Department, 501 Low Gap Road, Room 1326, Ukiah, CA 95482
 - Mr. Dave Goble, Public Works Department, 416 N. Franklin Street, Fort Bragg, CA 95437
 - Mr. Andy Whiteman, City Manager, 416 N. Franklin Street, Fort Bragg, CA 95437
 - Ms. Loie Rosenkrantz, 17201 Franklin Road, Fort Bragg, CA 95437
 - Mr. David L. Berry, Department of Toxic Substances Control, P.O. Box 806, Sacramento, CA 95812
 - Ms. Ashle Crocker, Remy, Thomas, Moose, and Manley, 455 Capitol Mall, Suite 210, Sacramento, CA 95814

E-mail cc list

From: Craig Hunt
To: Michael Acton

Date: 9/7/2005 8:24:17 AM

Subject: GP-FB Workplan #2 Response

Michael -

Here are the comments on the Workplan #2 (additional investigation) response:

- 1) In the general comments section, not included in the list of operations were operations at the site since the shutdown of main operations (e.g., the wood treatment operation). Please include those.
- 2) Regarding the second comment for Parcel 3, I understand the notch in the property boundary east-northeast of the former mobile equipment shop seen in Figure 7 contains the location of an existing aboveground storage tanks, including a gasoline tank. An additional boring should be added immediately downgradient of that AST location.
- 3) Regarding the first comment for Parcel 5, my comment was directed also to the contamination found in potholes P5-PH1, P5-PH4, P5-PH5, P5-PH6, and P5-PH8.
- 4) Regarding tetrachlorophenol analysis (Analyses section), it was not explicitly stated in the response that the detection limit of 1.0 μ g/L would be reached. If you will not be able to reach that detection limit with your laboratory, please contact me and I can refer you to at least one lab that has reached that limit for work done in our region (we often see penta- and tetrachlorophenol analysis by something some labs call the Canadian pulp method).
- 5) Regarding the TPH analyses and the use of the TPH Criteria Working Group method, the details of that will need to be submitted before the workplan is approved.

Craig Hunt
Water Resource Control Engineer

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CC: Cody Walker; Julie Raming; Tuck Vath